

CITY OF PALM DESERT

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May 15, 2006

Jonathan Nadler
Southern California Association of Governments
Transportation Conformity Working Group
818 West Seventh Street, 12th Floor (Main Building)
Los Angeles, CA 90017

**Re: Monterey Avenue Interchange at Interstate 10 Improvement Project
EA 08-0F0500-Particulate Matter PM_{2.5} Conformity**

Dear Mr. Nadler:

The City of Palm Desert (City), in partnership with the California Department of Transportation (Caltrans) District 8 and the County of Riverside (County), proposes the reconstruction of the westbound ramps at the Interstate 10 (I-10)/Monterey Avenue Interchange (IC). The improvements are necessary to alleviate the increasing traffic spawning from the growing communities of Palm Desert, Thousand Palms and Rancho Mirage. The project proposes realignment of the existing westbound off-ramp and construction of an additional westbound on-ramp from Varner Road. Varner road runs parallel to and north of the Interstate 10 from Date Palm Drive to Jefferson Street. The addition of the new westbound ramps to Varner Road will improve the existing signalized intersection spacing between the existing westbound and eastbound ramp termini on Monterey Avenue. The City of Palm Desert plans to fund 100% of the project costs with local Measure A funds from the study phase through to design and construction of the preferred alternative.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in PM_{2.5} and PM₁₀ nonattainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with ("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP. Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in nonattainment and maintenance areas that are subject to

transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires PM_{2.5} and PM₁₀ hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM_{2.5} and PM₁₀ hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements without any further hot-spot analyses (40 CFR 93.116(a)). The final rule defines the projects of air quality concern that require a PM_{2.5} and PM₁₀ hot-spot analysis in 40 CFR 93.123(b)(1) as:¹

- (i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM_{2.5} or PM₁₀ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds

¹ U.S. Environmental Protection Agency and Federal Highway Administration, *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM₁₀ and PM_{2.5} Nonattainment and Maintenance Areas*, (PM₁₀ Protocol), March 2006, Appendix A.

regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

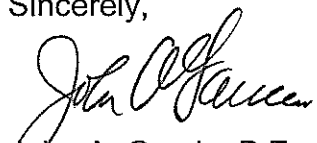
The project is currently programmed within the Southern California Association of Governments (SCAG) adopted 2004 Regional Transportation Improvement Plan (RTIP) and is described as follows: ID#RIV031208: at I-10/Monterey Ave IC – reconfigure and construct new westbound entry ramp from Varner Rd and realign/relocate westbound exit ramp.

The proposed improvements will improve local circulation and access to commercial and retail areas in the City. With out implementation of the proposed improvements, the existing westbound ramp intersection is forecast to operate at a deficient level of service (LOS), according to the acceptable County of Riverside performance criteria of LOS D or better. The realignment of the existing westbound off-ramp and the addition of a westbound on-ramp will decrease the accident rates on Monterey Avenue due to the increase in signalized intersection spacing between the westbound and eastbound ramp termini. Environmental and roadway conditions do not appear to be a contributing factor in the accidents cited for this segment of the Interstate 10 of the associated ramps at Monterey Avenue. The improvements are planned to accommodate future traffic projections to the year 2030.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to PM_{2.5} and PM₁₀ would occur

We understand that the Draft Environmental Assessment (EA) and supporting technical studies have been approved for release to FHWA pending receipt of a preliminary proposal relative to the treatment of the new PM_{2.5} requirement. The City respectfully requests District consideration and acceptance of this letter as formal validation of the project's insignificant contribution of PM_{2.5}. The EA and supporting Air Quality Study will be revised prior to public circulation of the Draft EA and will include a statements noted above regarding PM_{2.5}.

Sincerely,


John A. Garcia, P.E.
Engineering Manager

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

Project Description <i>from TIP, RTP, and/or project documents</i>						MPO ID#: RIV031208			
<p>The City of Palm Desert (City), in cooperation with the California Department of Transportation (Caltrans), propose to modify the existing westbound Interstate 10 (I-10) off-ramp at the Monterey Avenue Interchange, and to also add an additional on-ramp to westbound I-10. The project will be 100 percent funded with City and Measure A funds in the 2005/2006 fiscal year. A Cooperative Agreement has been prepared between Caltrans and City that establishes roles and responsibilities for the design and construction of the project. The Cooperative Agreement identifies the City of Palm Desert as the responsible agency for Advise, Award, and Administration (AAA) oversight of the project. Once completed, the interchange will be relinquished to Caltrans through a Cooperative Maintenance Agreement.</p> <p>The acquisition of three vacant parcels located to the east of Monterey Avenue between the existing westbound exist ramp and Varner Road would be required under any alternative design concept considered in this environmental document. Two of these parcels are remnant parcels from the previous interchange improvement project completed in 1990.</p> <p>The proposed project consists of the construction of a hook entrance ramp on Varner Road east of Monterey Avenue. The hook ramp will eliminate the left turn movement from northbound Monterey Avenue to the westbound on-ramp by allowing the traffic to make a right turn at the Varner Road intersection to access the hook on-ramp. An additional eastbound right turn lane will be provided for the traffic to access the proposed westbound on-ramp. A hook ramp will be provided to improve traffic flow along Monterey Avenue without affecting operations of the freeway as the hook entrance ramp joins the future fourth lanes of the westbound I-10 freeway and the existing westbound on-ramp will also merge with the future fourth lane of the I-10. The proposed project will remove the existing traffic control signal at the existing westbound ramp termini as well as lengthen the northbound Monterey Avenue left turn lanes onto Varner Road and the southbound Monterey Avenue left turn lane onto eastbound I-10. A signal is proposed for the intersection of the proposed westbound ramps.</p>									
Type of project <i>see list below</i> Reconfigure existing interchange									
County: Riverside		Narrative Location/Route & Postmiles: The I-10/Monterey interchange is located approximately 1.9 kilometers (km) (1.2 miles [mi]) east of the Ramon Road interchange and 3.7 km (2.3 mi) west of the Cook Street interchange. PM 44.0/45.0 (KP 70.8/72.4) Caltrans Projects – EA#: 0F0500							
Lead Agency: Orange County Transportation Authority									
Contact Person John Garcia			Phone# 760.346.0611		Fax# 760.341.7098		Email jgarcia@ci.palm-desert.ca.us		
Decision Desired <i>Check appropriate box below</i>									
PM2.5		<input type="checkbox"/>		MAYBE Project of Air Quality Concern		<input checked="" type="checkbox"/>		NOT Project of Air Quality Concern	
PM10		<input type="checkbox"/>		MAYBE Project of Air Quality Concern		<input checked="" type="checkbox"/>		NOT Project of Air Quality Concern	
Federal Action for which PM Analysis is Needed <i>Check appropriate box and describe in Comments below</i>									
<input checked="" type="checkbox"/>	CE	<input type="checkbox"/>	EA or Draft EIS	<input type="checkbox"/>	FONSI or Final EIS	<input type="checkbox"/>	PS&E or Construction	<input type="checkbox"/>	Other
Scheduled Date of Federal Action: Aug 2007									
Current Programming Dates <i>as appropriate</i>									
		PE/Environmental		ENG		ROW		CON	
Start		5/05		10/06		10/06		4/08	
End		7/05		3/08		3/08		7/09	

Project Purpose and Need (Summary): *Attach additional sheets as necessary*

The purpose of the I-10/Monterey Avenue interchange modification is to relieve traffic congestion and delays caused by population growth and proposed land use development within the City of Palm Desert, Thousand Palms and the surrounding communities in Riverside County. Monterey Avenue serves as a major arterial serving these communities as a commuter and commercial roadway. The existing interchange is a modified diamond (Type L-1) ramp configuration, with eastbound and westbound on- and off-ramps. Currently, the traffic on Monterey Avenue queues up on the Monterey Avenue overcrossing as a result of the northbound left turn movements onto the westbound I-10 on-ramp. The queuing is a common effect when the required stacking length of the lanes exceeds the intersection separation, as is the case of Monterey Avenue with an intersection length of approximately 100 m (328 ft), between the on- and off-ramps, and approximately 65 m (213 ft) between the westbound freeway ramps and Varner Road. This scenario also increases the potential of accidents as indicated in the accident analysis with the majority of the accidents at this intersection being broadsides and sideswipes, an indication of improper left turn movements.

Surrounding Land Use/Traffic Generators

Currently a Super Wal-Mart is to be completed and open to business in summer of 2006 south of the interchange and southeast of Monterey Avenue and Dinah Shore Drive intersection. A traffic impact analysis was specifically completed for the Super Wal-Mart, and, the traffic impact analysis for the proposed interchange improvements for year 2030 include traffic from the Super Wal-Mart. Just south of the Wal-mart location there is a Lowe's Home Improvement Center being constructed, with opening in summer 2006. These two large facilities along with the existing Home Depot and Costco in the area contribute heavy movements northbound on Monterey Ave, making lefts onto westbound I-10.

LOS, AADT, % trucks, truck AADT of proposed facility (opening year)

Refer to Table 1 (Existing and Opening Year Traffic Volumes) for opening Year (2010) traffic volumes and associated percentages of heavy truck traffic.

Table 1
Existing and Opening Year Traffic Volumes

	AADT Volumes		
	Existing	Year 2010	% Heavy Trucks ¹
I-10/Monterey Ramps			
WB Exit	6,810	7,250	8.0
WB Entrance	5,475	6,260	8.0
EB Exit	6,580	7,620	8.0
EB Entrance	4,635	5,305	8.0
I-10 Mainline			
WB west of I-10/Monterey.	46,000	56,635	13.0
EB west of I-10/Monterey.	46,000	56,635	13.0
WB east of I-10/Monterey.	44,500	51,175	13.0
EB east of I-10/Monterey.	44,500	51,175	13.0

¹ Ramp truck percentage based on Caltrans Route Concept Fact Sheet District 8 (March, 2000); Mainline truck percentage based on I-10/Portola Ave Interchange PSR (April, 2005).

Table 2 (Opening Year LOS) summarizes forecast year 2010 with project conditions AM peak hour and PM peak hour average stopped delay per vehicle and corresponding LOS of the study intersections.

Table 2
Opening Year LOS

Study Intersection	Year 2010 Without Project		Year 2010 With Project	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
	Delay – LOS (seconds)	Delay – LOS (seconds)	Delay – LOS (seconds)	Delay – LOS (seconds)
Monterey Ave/Vamer Rd	26.9 - C	25.1 - C	29.9 - C	26.7 - C
Monterey Ave/I-10 WB Ramps	25.3 - C	24.9 - C	0.5 - A	0.6 - A
Monterey Ave/I-10 EB Ramps	23.2 - C	21.9 - C	23.2 - C	21.8 - C
I-10 WB Ramps/Vamer Rd	N/A - N/A	N/A - N/A	12.6 - B	21.2 - C

Source: I-10/Monterey Avenue Interchange Reconfiguration Project Traffic Impact Analysis, August 2005.

LOS, AADT, % trucks, truck AADT of proposed facility (RTP horizon year)

Refer to Table 3 (Existing and Horizon Year Traffic Volumes) for horizon Year (2030) Traffic volumes and associated percentages of heavy truck traffic.

Table 3
Existing and Horizon Year Traffic Volumes

	AADT Volumes		
	Existing	Year 2030	% Heavy Trucks ¹
I-10/Monterey Ramps			
WB Exit	6,810	10,910	8.0
WB Entrance	5,475	11,050	8.0
EB Exit	6,580	9,435	8.0
EB Entrance	4,635	14,530	8.0
I-10 Mainline			
WB west of I-10/Monterey.	46,000	89,450	13.0
EB west of I-10/Monterey.	46,000	89,450	13.0
WB east of I-10/Monterey.	44,500	81,500	13.0
EB east of I-10/Monterey.	44,500	81,500	13.0
¹ Ramp truck percentage based on Caltrans Route Concept Fact Sheet District 8 (March, 2000); Mainline truck percentage based on I-10/Portola Ave Interchange PSR (April, 2005).			

Table 4 (Horizon Year LOS) summarizes forecast year 2030 with project conditions AM peak hour and PM peak hour average stopped delay per vehicle and corresponding LOS of the study intersections.

Table 4
Horizon Year LOS

Study Intersection	Year 2030 Without Project		Year 2030 With Project	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
	Delay – LOS (seconds)	Delay – LOS (seconds)	Delay – LOS (seconds)	Delay – LOS (seconds)
Monterey Ave/Varner Rd	30.1 - C	35.1 - D	34.8 - C	48.3 - D
Monterey Ave/I-10 WB Ramps	35.4 - D	88.5 - F	1.7 - A	2.8 - A
Monterey Ave/I-10 EB Ramps	37.0 - D	90.2 - F	37.0 - D	90.3 - F
I-10 WB Ramps/Varner Rd	N/A - N/A	N/A - N/A	16.7 - B	21.2 - C
Source: I-10/Monterey Avenue Interchange Reconfiguration Project Traffic Impact Analysis, August 2005.				

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (opening year): See Above

If facility is interchange(s) or intersection(s), cross-street AADT, % trucks, truck AADT (RTP horizon year): See Above

Describe potential traffic redistribution effects of congestion relief

Some traffic delays can be expected during construction of the project. However, the traffic impacts during construction are only temporary in nature and will cease upon completion of construction activities.

During the operational phase, the proposed project would result in the modification of the existing entrance and exit ramps at the I-10/Monterey Avenue interchange. No modifications to the existing I-10 mainline are planned as part of the project. Thus, local traffic is not expected to be significantly redistributed.

Comments/Explanation/Details

Attach additional sheets as necessary; include narrative reason why POAQC or Not POAQC decision is appropriate

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

Destination 2030 is the 2004 Regional Transportation Plan (RTP) (adopted in April 2004) for the six county region in Southern California including Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial counties. The RTP is the culmination of a three-year effort with a focus on improving the balance between land use and the current as well as future transportation systems. The Southern California Association of Governments (SCAG) is required to develop, maintain and update the RTP on a three-year cycle. The RTP provides the basic policy and program framework for long-term investment in our vast regional transportation system in a coordinated, cooperative and continuous manner. The proposed Interstate 10/Monterey Avenue Interchange Reconfiguration Project is subject to the requirement to determine conformity. The Project is included in the RTP (RTP ID RIV031208)

The proposed improvements will improve local circulation and access to commercial and retail areas in the City. Without implementation of the proposed improvements, the existing westbound ramp intersection is forecast to operate at a deficient level of service (LOS), according to the acceptable County of Riverside performance criteria of LOS D or better. The realignment of the existing westbound off-ramp and the addition of a westbound on-ramp will decrease the accident rate on Monterey Avenue due to the increase in signalized intersection spacing between the westbound and eastbound ramp termini. Environmental and roadway conditions do not appear to be a contributing factor in the accidents cited for this segment of the Interstate 10 (or the associated ramps at Monterey Avenue). The proposed improvements are planned to accommodate future traffic projections to Year 2030. Although the percentage of heavy truck traffic along the I-10 mainline is 13 percent, the project does not propose to modify any aspect of the interstate. The percentage of heavy truck traffic along the on- and off-ramps, which will be modified, is 8 percent and has an associated ADT of less than 125,000 vehicles. Note that this segment of I-10 does not serve any ports, rail yards or other significant sources of particulate matter.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to PM_{2.5} and PM₁₀ would occur.

TYPE OF PROJECT:

New state highway; Change to existing state highway

New regionally significant street; Change to existing regionally significant street

New interchange; Reconfigure existing interchange

Intersection channelization

Intersection signalization

Roadway realignment

Bus, rail, or inter-modal facility/terminal/transfer point

Truck weight/inspection station

At or affects location identified in the SIP as a site of actual or possible violation of NAAQS

REFERENCE:**Criteria for Projects of Air Quality Concern (40 CFR 93.123(b)(1)) – PM₁₀ and PM_{2.5} hot spots**

- (i) *New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;*
- (ii) *Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;*
- (iii) *New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;*
- (iv) *Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and*
- (v) *Projects in or affecting locations, areas, or categories of sites which are identified in the PM₁₀ or PM_{2.5} applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.*